

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

DRM, INC.,

Plaintiff,

v.

Case No. 14-cv-754

BLM LAND, LLC,

Defendant.

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

NOW COMES Defendant, BLM Land, LLC, by and through its undersigned counsel, and submits the following proposed voir dire questions to supplement the Court's standard questions.

1. Do you or any close family member own a business? What is the nature of the business? Have you or any close family member rented or leased space for the business? If yes, please explain.
2. Have you or any close family member ever worked in the food service industry? If yes, please explain when, where worked and what positions. Identify whether you have any management role in the food service business.
3. Are you or any close family member or friend a landlord? Have you or any close family member or friend ever been a landlord? If yes, please explain and also state whether the rented property is/was residential or commercial.
4. Do you have more experience than the ordinary person with contracts, either through your line of work or your personal life? If yes, please explain.
5. Do you have any experience with land that is or was subject to a restriction on how it may be used? If yes, please explain.

6. Are any of you familiar with restrictions on the use of property, either through your line of work or your personal life? If yes, please explain.
7. Are any of you familiar with restrictive covenants on property, either through your line of work or your personal life? If yes, please explain.
8. Have you or any close family member or friend ever had a dispute with a landlord or tenant that resulted in the filing of a lawsuit? If so, please explain.
9. Have you or any close family member or friend ever had a disagreement with anyone over the meaning of a contract or part of a contract? If so, please explain.
10. Do you or any close family member have experience in real estate, law, or land development? If so, please explain.
11. Do you have any more or less knowledge than the ordinary person of the menu items offered at various fast food or casual restaurants? If so, please explain.

Dated this 24th day of April, 2015.

s/ Lori M. Lubinsky
State Bar No. 1027575
Attorneys for Defendant
AXLEY BRYNELSON, LLP
P.O. Box 1767
Madison, WI 53701-1767
Telephone: 608-257-5661
E-mail: llubinsky@axley.com